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Attorney for Plaintiff,
Jose Escobedo

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOSE ESCOBEDO,

Plaintiff,

vs.

GILDA A. PAPAZIAN, Trustee of the
GILDA A. PAPAZIAN REVOCABLE
TRUST under Trust Agreement dated January
14, 2010, et al.,

Defendants.

No. 1:24-cv-00636-SKO

**STIPULATION GRANTING PLAINTIFF
LEAVE TO FILE FIRST AMENDED
COMPLAINT; ORDER**

(Doc. 39)

IT IS HEREBY STIPULATED by and between Plaintiff, Jose Escobedo (“Plaintiff”), and Defendants, Gilda A. Papazian, Trustee of the Gilda A. Papazian Revocable Trust under Trust Agreement dated January 14, 2010; Kimberly R. Stillmaker, Trustee of the Kimberly R. Hudson Revocable Trust under Trust Agreement dated January 14, 2010; and SA & SM LLC dba Mariscos El Diamante (collectively “Defendants,” and together with Plaintiff, the “Parties”), the parties hereto, through their respective attorneys of record, that Plaintiff may file a First Amended Complaint, a copy of which is attached hereto as Exhibit “A.” This amendment will not modify any date or deadline fixed by the Court’s Scheduling Order dated March 28, 2025 (Dkt. 37) pursuant to Fed. R. Civ. P. 16(b)(4), and is not prejudicial to Defendants, the product of undue delay, proposed in bad faith, or futile.

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT; ORDER

IT IS FURTHER STIPULATED that Plaintiff will file the First Amended Complaint within five (5) calendar days of the Court's Order permitting such filing, and that Defendants' response thereto shall be filed within fourteen (14) days after the First Amended Complaint is filed.

IT IS SO STIPULATED.

Dated: May 13, 2025

MOORE LAW FIRM, P.C.

/s/ Tanya E. Moore

Tanya E. Moore

Attorney for Plaintiff,

Jose Escobedo

Dated: June 11, 2025

GOLDEN LAW A.P.C.

/s/ Rachelle Taylor Golden

Rachelle Taylor Golden

Attorneys for Defendants,

Gilda A. Papazian, Trustee of the Gilda A.

Papazian Revocable Trust under Trust

Agreement dated January 14, 2010;

Kimberly R. Stillmaker, Trustee of the

Kimberly R. Hudson Revocable Trust under
Trust Agreement dated January 14, 2010

Dated: June 16, 2025

CHAPMAN LAW P.C.

/s/ Zena M. Sin-Zaragoza

Zena M. Sin-Zaragoza

Andrea M. Chapman

Attorneys for Defendant,

SA & SM LLC dba Mariscos El Diamante

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT; ORDER

ORDER

Based on the Parties' above stipulation, (Doc. 39), and good cause appearing, **IT IS HEREBY ORDERED** that within five (5) days of the date of this Order, Plaintiffs shall file an Amended Complaint conforming to the proposed amended complaint filed as an exhibit to the Parties' Stipulation.

IT IS FURTHER ORDERED that Defendants' response shall be filed within fourteen (14) days after the First Amended Complaint is filed.

IT IS SO ORDERED.

Dated: **June 20, 2025**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE

STIPULATION GRANTING PLAINTIFF LEAVE TO FILE FIRST AMENDED COMPLAINT; ORDER